

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CHRISTOPHER HOFMANN, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

JERICO PICTURES, INC. d/b/a NATIONAL
PUBLIC DATA,

Defendant,

Case No. 0:24-cv-61383-DSL

**DEFENDANT’S EX PARTE MOTION TO EXTEND TIME TO FILE AN ANSWER OR
RESPONSIVE PLEADING**

JERICO PICTURES, INC. d/b/a NATIONAL PUBLIC DATA (hereinafter “Defendant”), by and through undersigned counsel, respectfully moves this Court for an extension of the deadline for filing its Answer in the above-referenced case, pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Rules 7.1. Defendant requests sixty (60) days to file its Answer. As grounds for this motion, Defendant states the following:

1. The deadline for filing an Answer in the above-referenced case, under Rule 12 of the Federal Rules of Civil Procedure, was August 28, 2024.
2. The Defendant in this Class Action Complaint faces more than ten similar complaints filed at roughly the same time in other cases.
3. The extension of time is necessary because undersigned Counsel needs time to review, investigate, and answer each complaint competently. Counsel also requests an

extension due to the undersigned's caseload, which includes matters pending in different jurisdictions in state court.

4. No parties will be prejudiced by the relief requested in this Motion and this Motion is not filed for the purpose of delay.
5. Based on the foregoing, Defendant has demonstrated good cause to extend the time to answer to sixty days.
6. The Defendant asks the Court to consider that given the number of complaints and lawsuits arriving at the Defendants offices, that this motion was filed after the deadline to answer as the result of excusable neglect.

For the foregoing reasons, Defendant JERICO PICTURES, INC. d/b/a NATIONAL PUBLIC DATA respectfully requests that this Honorable Court grant this Motion and enter an order extending the deadline to Answer to sixty (60) days from the date of signing of the Court's Order.

Dated: September 5, 2024

Respectfully submitted,

/s/ Angelo A. Gasparri
Angelo A. Gasparri, Esq.
Florida Bar Number: 32158

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served by e-file and/or email on September 5, 2024 on all counsel or parties of record on the Service List below.

/s/ Angelo A. Gasparri
Angelo A. Gasparri, Esq.

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